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Superior Court of California
County of Los Angeles

AUG 15 2018

Sherri R. Carter, Executive Officer/Clerk
By: Glorietta Robinson, Deputy

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA BY FAX
11 FOR THE COUNTY OF LOS ANGELES

12 KATHERINE MCNENNY and ADRIAN
13 RISKIN,

14 Petitioners and Plaintiffs,

15 vs.

16 LOS ANGELES CHINATOWN BUSINESS
COUNCIL, a non-profit corporation,

17 Respondent and Defendant.

Case No.:

BS 174784

VERIFIED PETITION FOR WRIT OF
MANDATE AND COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF

[Gov't Code §§ 6250, *et seq.*; Civ. Proc. Code
§§ 1085, *et seq.*]

1 **INTRODUCTION**

2 1. This is a petition to enforce the California Public Records Act (“CPRA”) against
3 Respondent and Defendant (“Respondent”) the Los Angeles Chinatown Business Council.
4 Petitioners and Plaintiffs (“Petitioners”) Katherine McNenny and Adrian Riskin submitted various
5 requests for public records to the Greater Chinatown Business Improvement District (“the BID”),
6 which Respondent administers. These requests asked for access to clearly-identifiable records
7 subject to mandatory disclosure under the CPRA. Despite Petitioners’ repeated attempts to request
8 records by email, certified mail, and telephone, Respondent has failed to respond at all to any of
9 these requests. Respondent has thereby violated the CPRA.

10 2. Petitioners are seeking records to better understand the BID’s political role in Los
11 Angeles. In particular, Petitioners seek information to understand the BID’s part in opposing the
12 formation of the Skid Row Neighborhood Council (“SRNC”). The formation of the SRNC, which
13 was at issue in an April 6th, 2017 election, would have allowed the residents of Skid Row—many
14 of whom are homeless, low-income, marginalized on the basis of identity, or otherwise alienated
15 from formal power within the City of Los Angeles—to more easily communicate with the City’s
16 elected leadership and to obtain funding to better meet local needs. Homeless and low-income
17 residents would have had multiple designated board seats on the SRNC, whereas Skid Row has
18 historically been within the jurisdiction of neighborhood councils dominated by business
19 representatives and property-owning stakeholders. Business interests, including a confederation of
20 Business Improvement Districts (“BIDs”) participating in the organization “United Downtown LA,
21 LLC,” (“United DTLA”), opposed the formation of the SRNC. United DTLA hired former Los
22 Angeles City Attorney Rocky Delgadillo as a lobbyist and endeavored to prevent the formation of
23 the SRNC. After a close and controversial election, which is now the subject of litigation, the
24 SRNC’s formation was defeated. Subsequent to the election, records obtained from various BIDs
25 via public record requests revealed BIDs’ roles in United DTLA and the effort to defeat the SRNC.
26 Records suggest that the Greater Chinatown BID may have been among those BIDs participating in
27 the effort.

28 3. The public’s access to information is obstructed by Respondent’s repeated and

1 systemic violations of the CPRA. By this Petition and Complaint (“Petition”) and pursuant to the
2 Code of Civil Procedure §§ 1085, *et seq.* and Government Code §§ 6250, *et seq.*,¹ Petitioners
3 respectfully request from this Court: a writ of mandate to command Respondent to disclose all non-
4 exempt information Petitioners requested and thereby comply with the CPRA; a declaration that
5 Respondent’s conduct fails to comply with the CPRA; and a permanent injunction enjoining
6 Respondent from continuing its pattern and practice of disregarding public record requests and
7 violating the CPRA.

8 **JURISDICTION AND VENUE**

9 4. This Court has jurisdiction under Gov’t Code §§ 6258, 6259, Code of Civ. Proc.
10 § 1085, and Article VI, Section 10 of the California Constitution.

11 5. Venue is proper in this Court. The records in question, or some portion of them, are
12 situated in the County of Los Angeles, Gov’t Code § 6259; the acts or omissions complained of
13 occurred in the County of Los Angeles, Code of Civ. Proc. § 393; and Respondent is located in the
14 County of Los Angeles, Code of Civ. Proc. § 395.

15 **PARTIES**

16 6. Petitioner Katherine McNenny is a resident of Los Angeles who participated in the
17 Skid Row Neighborhood Council Formation Committee. McNenny lives in the Skid Row area and
18 worked diligently towards the formation of the SRNC. Subsequent to the election, McNenny
19 submitted a number of CPRA requests regarding both the administration of the election and the role
20 of BIDs in opposing the formation of the SRNC. Documents obtained in response to these requests
21 and similar requests submitted by other individuals informed the public’s understanding of BIDs’
22 role in the SRNC election. Information from those disclosures has been featured in media articles
23 from outlets including LA Weekly and Los Angeles Magazine. Petitioner is a member of the public
24 within the meaning of §§ 6252(b)-(c).

25 7. Petitioner Adrian Riskin is a resident of Los Angeles, holds a PhD in mathematics, is
26 a mathematics professor at a local college, and is an open records activist. Riskin utilizes public
27 record requests to investigate and understand the activities of BIDs, the Los Angeles City

28 ¹ Unless otherwise stated, all references to code sections are to the California Government Code.

1 government, and the relationship between the two. He publicizes his findings to the public through
2 blogging and community events. Information Riskin has uncovered via CPRA requests has assisted
3 academic researchers and the public at large in understanding BIDs and their power in the
4 community. For example, Riskin's research regarding BIDs' involvement in the thwarted
5 formulation of the SRNC, uncovered largely through public records requests, was recently featured
6 as part of an exhibit at the Los Angeles Poverty Department Museum. Documentary filmmakers
7 have used records Riskin uncovered to inform their ongoing production of a film on the Greater
8 West Hollywood Food Coalition and the Hollywood Media District BID. Additionally, Riskin has
9 empowered the public to use the CPRA effectively for both research and civic activism by
10 publishing a guide to the practical use of the CPRA in the City of Los Angeles. Riskin is a member
11 of the public within the meaning of §§ 6252(b)-(c).

12 8. Respondent the Los Angeles Chinatown Business Council is a property owners'
13 association pursuant to the Property and Business Improvement District Law of 1994, California
14 Streets & Highways Code § 36600, *et seq.* Respondent contracts with the City of Los Angeles to
15 administer the Greater Chinatown BID. Respondent is subject to the CPRA as a matter of state law.
16 California Streets & Highways Code § 36612. Respondent's contract with the City of Los Angeles
17 also explicitly states that it is "subject to and must comply with" the CPRA.

18 **FACTUAL ALLEGATIONS**

19 **Background on the SRNC election at issue in Petitioners' unanswered CPRA requests**

20 9. The City of Los Angeles utilizes a citywide system of neighborhood councils,
21 created by ordinance, to assist communities in working with local government to address
22 community needs. There are 97 neighborhood councils across Los Angeles, each receiving public
23 funds to support their activities. The Los Angeles Department of Neighborhood Empowerment
24 ("DONE") coordinates with the neighborhood councils and provides operational support.

25 10. On November 29, 2016, the Skid Row Neighborhood Council Formation Committee
26 submitted a subdivision application to DONE to initiate an election to subdivide existing
27 neighborhood councils in order to form a new Skid Row Neighborhood Council. The committee
28 took special consideration in drafting the proposed SRNC bylaws to guarantee multiple board seats

1 to low-income renters and/or unhoused individuals, as well as to those providing services to those
2 communities. This arrangement is in contrast to other local neighborhood councils, including the
3 Downtown Los Angeles Neighborhood Council (from which the SRNC would have been
4 subdivided), in which business interests comprise a majority of the governing board under the
5 bylaws and no seats are designated for renters, let alone low-income renters.

6 11. On January 11, 2017, DONE approved the subdivision application. Subsequently, an
7 election to establish the new SRNC was scheduled for March 29, 2017 to April 6, 2017.

8 12. At the conclusion of voting, the formation of the SRNC was narrowly defeated, with
9 DONE's official canvass of votes showing 766 votes in favor of, and 826 votes opposed to, the
10 formation of the SRNC.

11 **Respondent violated the CPRA by failing to provide any public records in response to**
12 **McNenny's public record requests**

13 13. On May 28, 2017, McNenny submitted a CPRA request to Respondent via its public-
14 facing email address, info@chinatownla.com. The request sought two categories of records: (1) all
15 emails which contained an enumerated list of names and/or phrases related to the SRNC election;
16 and (2) all emails to and/or from various named individuals. The request sought records from
17 January 1, 2017 through May 28, 2017. Respondent provided no response to McNenny's CPRA
18 request. *A true and correct copy of McNenny's May 28, 2017 email to Respondent is attached in*
19 *Exhibit A.*

20 14. On June 15, 2017, McNenny sent another email to Respondent inquiring as to the
21 status of her request. She notified Respondent that it had not complied with its legal duty to respond
22 to her request within 10 days of receipt. *See* § 6253(c). Again, Respondent provided no response to
23 McNenny's email. *A true and correct copy of McNenny's June 15, 2017 email to Respondent is*
24 *attached in Exhibit A.*

25 15. Rather than proceeding directly to litigation, McNenny sent yet another email to
26 Respondent inquiring as to the status of her request on May 5, 2018. She informed Respondent that
27 its failure to respond to her requests violated the CPRA. She requested that Respondent reply and
28 provide the requested records promptly "so this matter can be resolved without legal action."

1 Further, McNenny additionally requested records reflecting the staff and/or individuals who were
2 authorized to conduct business on behalf of the BID from January 1, 2017 to May 28, 2017. Again,
3 Respondent provided no response to McNenny's email. *A true and correct copy of McNenny's May*
4 *5, 2018 email to Respondent is attached in Exhibit A.*

5 16. On July 2, 2018, undersigned counsel telephoned Respondent at the telephone
6 number listed on the "Contact Us" page of the BID's website. Because there was no answer,
7 counsel left a voice message inquiring as to the proper location to submit CPRA requests and
8 providing a telephone number for response. Respondent provided no response to this telephone call.

9 17. Rather than proceeding directly to litigation, McNenny again sent her CPRA request
10 to Respondent on July 23, 2018, this time by certified mail to the mailing address listed on the
11 "Contact Us" page of the BID's website. The mailing address is also the address Respondent lists
12 with the Secretary of State for service of process. The letter was delivered on July 25, 2018.
13 McNenny stated in her letter that, if she did not receive a response by close of business on July 27,
14 2018, she would understand the non-response as the BID's refusal to provide records. Again,
15 Respondent provided no response to McNenny's letter. *A true and correct copy of McNenny's July*
16 *23, 2018 letter to Respondent, as well as a true and correct copy of its certified receipt, are*
17 *attached in Exhibit A.*

18 18. McNenny sent one final email to Respondent on July 25, 2018 reiterating her public
19 records requests and asking that Respondent provide the requested records promptly "so this matter
20 can be resolved without legal action." Yet again, Respondent provided no response to this email. *A*
21 *true and correct copy of McNenny's July 25, 2018 email to Respondent is attached in Exhibit A.*

22 19. In sum, after repeated communications through multiple points of contact and
23 various attempts to avoid litigation, Respondent has failed to respond in any way whatsoever to
24 McNenny's CPRA requests—let alone within 10 days as required by statute. *See* § 6253(c). In the
25 approximately 14 months since McNenny first submitted her request, Respondent has ignored
26 McNenny entirely and failed to provide even one responsive record. Respondent has thereby
27 violated the CPRA.
28

Respondent violated the CPRA by failing to provide any public records in response to Riskin's public record requests

20. On March 23, 2018, Riskin submitted a CPRA request ("Request 1") to Respondent via its public-facing email address, info@chinatownla.com. The request sought emails sent to/from/cc/bcc various named individuals and domain names, as well as all emails in the possession of anyone on the BID's staff or board that contain the word "Skid." The time scope of the request was from January 1, 2017 through the date of the BID's compliance with the request. Respondent provided no response to Request 1. *A true and correct copy of Riskin's March 23, 2018 email to Respondent is attached in Exhibit B.*

21. On both April 6, 2018 and June 7, 2018, Riskin sent emails to Respondent inquiring as the status of Request 1. He notified Respondent that it had failed to reply to his request within 10 days, as required by statute. *See § 6253(c).* Respondent provided no response to either of these follow-up communications. *A true and correct copy of these April 6, 2018 and June 7, 2018 emails to Respondent are attached in Exhibit B.*

22. On March 31, 2018, Riskin submitted a second CPRA request ("Request 2") to Respondent via email. The request sought emails between anyone on the BID's board or staff and the email address michaelkfong@gmail.com. The time scope of the request was between January 1, 2015 and the date of the BID's compliance with the request. Respondent provided no response to Request 2. *A true and correct copy of this March 31, 2018 email to Respondent is attached in Exhibit C.*

23. On both April 11, 2018 and June 7, 2018, Riskin sent emails to Respondent inquiring as to the status of Request 2. Respondent provided no response to either of these follow-up communications. *A true and correct copy of these April 11, 2018 and June 7, 2018 emails to Respondent are attached in Exhibit C.*

24. On March 31, 2018, Riskin submitted a third and final CPRA request ("Request 3") to Respondent via email. The request sought emails between anyone on the BID's board or staff and anyone at the domain marvimon.com. The time scope of the request was between January 1, 2015 and the date of the BID's compliance with the request. Respondent provided no response to Request

1 3. *A true and correct copy of this March 31, 2018 email to Respondent is attached in Exhibit D.*

2 25. On both April 11, 2018 and June 7, 2018, Riskin sent emails to Respondent inquiring
3 as to the status of Request 3. Respondent provided no response to either of these follow-up
4 communications. *A true and correct copy of these April 11, 2018 and June 7, 2018 emails to*
5 *Respondent are attached in Exhibit D.*

6 26. Rather than proceeding directly to litigation, on April 26, 2018, Riskin sent to
7 Respondent via certified mail copies of all three of his public record requests. Riskin mailed the
8 copies to George Yu, the Executive Director of the BID, at the mailing address listed on the
9 “Contact Us” page of the BID’s website. The mailing address is also the address Respondent lists
10 with the Secretary of State for service of process. The letter was delivered on April 28, 2018. *A true*
11 *and correct copy of the certified mail receipt is attached as Exhibit E.*

12 27. As stated above, undersigned counsel telephoned Respondent on July 2, 2018 at the
13 telephone number listed on the “Contact Us” page of the BID’s website. Because there was no
14 answer, counsel left a voice message inquiring as to the proper location to submit CPRA requests
15 and providing a telephone number for response. Respondent provided no response to this telephone
16 call.

17 28. Despite Riskin’s repeated efforts to persuade the BID to respond to his requests
18 without litigation, Respondent has failed to respond in any way whatsoever to any of Riskin’s
19 requests. In the over four months since Riskin first submitted his requests, Respondent has ignored
20 Riskin’s communications entirely and failed to provide even one responsive record. Respondent has
21 thereby violated the CPRA.

22 **Records responsive to McNenny’s and Riskin’s requests exist, demonstrating that**
23 **Respondent is unlawfully withholding public records**

24 29. Information obtained through other CPRA requests demonstrates that records
25 responsive to several of Petitioners’ requests exist and are therefore clearly being withheld by
26 Respondent.

27 30. As one example, McNenny’s May 28, 2017 request asked for all Respondent’s
28 emails that mention the “Skid Row Neighborhood Council,” and Riskin’s March 23, 2018 request

1 asked for all emails in the possession of anyone on the BID's staff or board that contain the word
2 "Skid." Petitioners are in possession of an email chain sent to various individuals, including the
3 BID's Executive Director George Yu, with the subject line "***IMPORTANT UPDATE** Skid
4 Row Neighborhood Council." Emails in the chain were sent in March 2017 and April 2017, within
5 the time frames of both Petitioners' requests. Some emails ask BID representatives to appear at a
6 city council committee meeting to testify about the SRNC election. In other emails, BID
7 representatives are encouraged to send their staff members to pop-up polls, and some email authors
8 state that they would like to only validate parking at pop-up polls for those voting against the
9 creation of the SRNC. These records are clearly responsive to both Petitioners' requests. *True and*
10 *accurate copies of these emails are attached to this petition in Exhibit F.*

11 31. Records exist which shed light on other important aspects of the BID's functions, as
12 well. Petitioners are in possession of a June 2, 2017 email from George Yu to Rita Moreno at
13 "rita.moreno@lacity.org." This email discusses Yu's frustration that his BID officers were required
14 to attend a meeting related to the mandatory registration of their private security guards with the
15 Los Angeles Police Commission. He expresses in this email his belief that enforcement of the
16 registration requirement was precipitated by Riskin's research and advocacy about the issue as
17 related to BIDs. Riskin's March 23, 2018 request asked for all emails between BID board members
18 and anyone at lacity.org from January 1, 2017 to the date of compliance. This email is clearly
19 responsive to Riskin's request. *A true and accurate copy of this email is attached to this petition in*
20 *Exhibit F.*

21 32. Although records responsive to Petitioners' requests clearly exist, the BID withheld
22 all such records. Respondent thereby maintains these critical records in complete secrecy, thereby
23 frustrating the democratic process and violating the CPRA.

24 **Factual Summary**

25 33. Respondent has repeatedly and as a matter of course violated the CPRA. Respondent
26 has failed to make any determination as to whether Petitioners' requests were for disclosable
27 records in the BID's possession, let alone do so within the 10-day statutory deadline. *See* § 6253(c).
28 Respondent has failed to provide an estimated date by which the requested records would be made

available, let alone to do so within the 10-day statutory deadline. *Id.* Most notably, Respondent failed to provide even a single requested record to Petitioners, let alone to do so “promptly” as required by law. *See* § 6253(b).

34. Respondent's pattern and practice of failing to produce public records in response to requests—and, in fact, ignoring requests entirely—effectively makes secret the operations of the Greater Chinatown BID and shields Respondent from public accountability. Particularly given Respondent's suspected involvement in the defeat of the SRNC, which prevented some of Los Angeles' most disenfranchised residents from exercising political power, the public interest in the requested public records is great. Judicial action is therefore necessary to enforce the requirements of the CPRA against Respondent.

FIRST CAUSE OF ACTION:
PETITION FOR WRIT OF MANDATE PURSUANT TO THE CALIFORNIA PUBLIC
RECORDS ACT, GOV'T CODE § 6250, et seq.

35. Petitioners incorporate herein by reference the allegations of paragraphs 1 through 34 above, as if set forth in full.

General principles of the California Public Records Act

36. Under the California Public Records Act, § 6250 *et seq.*, all records that are prepared, owned, used, or retained by any public agency and that are not subject to the CPRA's statutory exemptions to disclosure must be made publicly available for inspection and copying upon request. §§ 6253(a)-(b).

37. When a member of the public submits a record request to an agency, the agency is given 10 days to determine whether the request seeks copies of disclosable public records in the possession of the agency and must promptly notify the requestor of that determination and the reasons therefor. § 6253(c). In statutorily-identified “unusual circumstances,” and “only to the extent reasonably necessary to the proper processing of the particular request,” this time period may be extended a maximum of 14 days. § 6253(c)-(d).

38. The law requires that agencies make non-exempt public records available to requestors “promptly.” § 6253(b). It is unlawful for an agency “to delay or obstruct the inspection

1 of public records.” § 6253(d).

2 39. Where an agency withholds responsive records on the basis of a statutory exemption,
3 “the agency . . . must disclose that fact.” *Haynie v. Super. Ct.* 26 Cal. 4th 1061, 1072 (2001) (citing
4 § 6255). Even if portions of a document are exempt from disclosure, the agency must disclose the
5 remainder of the document. § 6253(a). The agency bears the burden of justifying nondisclosure.
6 § 6255(a). In determining whether exemptions apply, courts must follow the constitutional
7 imperative that the applicability of exemptions must be construed narrowly and that the people’s
8 right of access to public information must be construed broadly. Cal. Constitution, Art. I, § 3(b)(2).

9 40. The CPRA also requires the government to “assist the member of the public [to]
10 make a focused and effective request that reasonably describes an identifiable record or records” by
11 taking steps to “[a]ssist the member of the public to identify records and information that are
12 responsive to the request or to the purpose of the request, if stated.” § 6253.1. An agency that
13 receives a request must also “[p]rovide suggestions for overcoming any practical basis for denying
14 access to the records or information sought.” *Id.*

15 41. Whenever it is made to appear by verified petition to the Superior Court of the
16 county where the records or some part thereof are situated that certain public records are being
17 improperly withheld from a member of the public, the Court shall order the officer or person
18 charged with withholding the records to disclose the public record or show cause why he or she
19 should not do so. The Court shall decide the case after examining the record in camera (if permitted
20 by the Evidence Code), papers filed by the parties, and any oral argument and additional evidence
21 as the Court may allow. § 6259(a). If the Court finds that the failure to disclose is not justified, it
22 shall order the public official to make the record public. § 6259(b).

23 42. A petitioner prevails under the CPRA where the petitioner shows that an agency
24 unlawfully denied access to records. *Community Youth Athletic Center v. City of National City*, 220
25 Cal.App.4th 1385, 1446-1447 (2013). An agency is not protected from liability merely because the
26 denial of access was due to the agency’s internal logistical problems or general neglect of its duties.
27 *Id.*

28 43. Public policy favors judicial enforcement of the CPRA. The CPRA contains a

1 mandatory attorneys' fee provision for the prevailing plaintiff. § 6259(d). The purpose of the
2 provision is to provide "protections and incentives for members of the public to seek judicial
3 enforcement of their right to inspect public records subject to disclosure." *Filarsky v. Super. Ct.*, 28
4 Cal.4th 419, 427 (2002).

5 44. Here, Respondent repeatedly violated the CPRA by denying Petitioners any access to
6 all public records they requested. The public records that Petitioners requested are not properly
7 subject to any of the CPRA's statutory exemptions, nor did Respondent cite any exemptions to
8 justify its nondisclosure. Respondent therefore acted unlawfully in contravening its duty to make
9 such records available.

10 **Respondent unlawfully denied access to Petitioners' requested public records**

11 45. Petitioners submitted five total requests for straightforward, easy-to-produce records
12 that would shed light on the BID's exercise of political power in Los Angeles. For each of those
13 requests, Respondent denied all access to public records through its pattern and practice of non-
14 response. Respondent never once indicated that it conducted a search for those requested records.
15 Respondent never once made a determination as to whether those requested records were
16 disclosable. Respondent never once provided an estimate as to when those requested records would
17 be produced. Respondent never once stated under which exemptions, if any, it was withholding
18 records. And most notably, Respondent never once provided any public records in response to
19 Petitioners' requests, despite Petitioner's repeated follow-up communications through various
20 points of contact regarding the requests. To date, it has been over 14 months since McNenny
21 submitted her first request and over 4 months since Riskin submitted his first request. By failing to
22 produce even one of these public records, Respondent is maintaining in a shroud of secrecy records
23 related to the BID's political activity and communications.

24 46. Respondent's denial of access and its failure to even communicate with Petitioners
25 regarding their requests not only violates the letter of the CPRA, but also its spirit. The CPRA is
26 predicated on the principle that:

27 Openness in government is essential to the functioning of democracy. Implicit in
28 the democratic process is the notion that government should be accountable for its

1 actions. In order to verify accountability, individuals must have access to
2 government files. Such access permits checks against the arbitrary exercise of
official power and secrecy in the political process.

3 *Int'l Fed. Of Professional and Technical Engineers, Local 21, AFL-CIO v. Super. Ct.*, 42 Cal.4th
4 319, 328-39 (2007) (internal quotations omitted). By repeatedly failing to respond to requests for so
5 long, Respondent denies the public access to vital public information, and it withholds access to
6 records while they are current and most relevant to the public interest. In so doing, Respondent
7 shields itself from public scrutiny and disrupts the democratic process.

8 47. The CPRA is one of the only tools the public possesses for transparency and
9 accountability over BIDs. Public access to records through the CPRA sheds light on the BID's
10 political activity and its operation outside the public eye. By withholding all requested information,
11 Respondent is shielding from disclosure information that could reveal BID actions of significant
12 public concern. As such, Respondent's clear violations of the CPRA require judicial intervention.

13 **A WRIT OF MANDATE AND DECLARATORY AND INJUNCTIVE RELIEF ARE**
14 **APPROPRIATE**

15 48. Petitioners incorporate herein by reference the allegations of paragraphs 1 through 47
16 above, as if set forth in full.

17 49. Petitioner is entitled to seek a writ of mandate, declaratory relief, and injunctive
18 relief in response to violation of the CPRA. § 6258. Petitioner has no plain, speedy, adequate
19 remedy in the ordinary course of law other than the relief sought in this petition. *See* Code of Civil
20 Procedure § 1086.31.

21 50. Respondent has a clear, present, ministerial duty to comply with Gov't Code
22 §§ 6250, *et seq.* Respondent has repeatedly acted and continues to act in violation of the CPRA by
23 maintaining a pattern and practice of denial of access to public information through impermissible
24 delay, non-responsiveness, and indiscriminately withholding all records from the public. § 6253(b),
25 (d).

26 51. Petitioner has performed all conditions precedent to filing this petition. There are no
27 administrative exhaustion requirements under Government Code § 6250, *et seq.*

28 52. An actual controversy exists between the parties concerning whether Respondent has

1 engaged in conduct that violates the statutory requirements of the CPRA. A judicial determination
2 to resolve this actual controversy is necessary and appropriate at this time.

3
4 **PRAYER FOR RELIEF**

5 WHEREFORE, Petitioners pray for judgment as follows:

- 6 1. For issuance a writ of mandate directing Respondent to provide Petitioners with all
7 requested records, except those records that the Court determines may lawfully be
8 withheld;
- 9 2. For a declaration that Respondent's conduct, policies, and pattern and practice of
10 denying access to public records violates the CPRA;
- 11 3. For a permanent injunction enjoining Respondent, its agents, employees, officers, and
12 representatives from continuing its existing pattern and practice of violating the
13 statutory requirements of the CPRA, and ordering Respondent to track and report to
14 the Court and to the public on its responses to public records requests for a period of
15 time not less than one year;
- 16 4. For Petitioners to be awarded reasonable attorneys' fees and costs; and
- 17 5. For such other and further relief as the Court deems proper and just.

18
19 Dated: 8-11-18

Respectfully submitted,

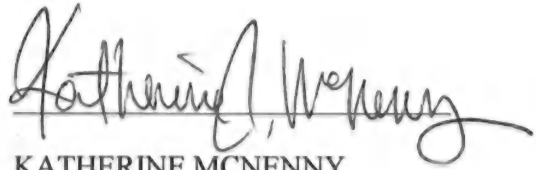
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22 ANNA VON HERRMANN
23 Attorney for Petitioners and Plaintiffs
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28

VERIFICATION

I, KATHERINE MCNENNY, am a Petitioner and Plaintiff in this action. I have read the foregoing Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief, and I know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and, as to those matters, I also believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this the 12th day of August, 2018 in LOS ANGELES California.



KATHERINE MCNENNY
Petitioner and Plaintiff

VERIFICATION

I, ADRIAN RISKIN, am a Petitioner and Plaintiff in this action. I have read the foregoing Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief, and I know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and, as to those matters, I also believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this the 14th day of August, 2018 in Los Angeles, California.



ADRIAN RISKIN
Petitioner and Plaintiff

INDEX OF EXHIBITS

EXHIBIT A: Petitioner McNenny's May 28, 2017 PRA to Respondent and follow-up correspondence.

EXHIBIT B: Petitioner Riskin's March 23, 2018 PRA to Respondent and follow-up correspondence.

EXHIBIT C: Petitioner Riskin's first March 31, 2018 PRA to Respondent and follow-up correspondence.

EXHIBIT D: Petitioner Riskin's second March 31, 2018 PRA to Respondent and follow-up correspondence.

EXHIBIT E: Petitioner Riskin's April 26, 2018 certified letter receipt.

EXHIBIT F: Emails responsive to Petitioners' requests which Respondent withheld.

EXHIBIT A

Subject: This is a Public Records Request

From: Katherine McNenny [REDACTED]

To: info@chinatownla.com;

Cc: [REDACTED]

Date: Sunday, May 28, 2017 4:17 PM

Hello,

This is a public records request for all emails (in electronic form only please) from January 1st 2017 to today, May 28th 2017 which include all mentions of:

- The Skid Row Neighborhood Council or The Skid Row Neighborhood Council Formation Committee
- Liner Law, Liner or Liner LLP
- Unite DTLA
- United DTLA
- United Downtown LA, LLC
- Rocky Delgadillo
- Matthew Nichols
- Chris Loos
- General Jeff or Jeff Page
- Katherine McNenny
- The Little Tokyo Lofts
- DLANC (The Downtown Los Angeles Neighborhood Council)
- The Downtown News or any reporter from the Downtown News
- The LA Times or any reporter from the LA Times
- HCNC (Historic Cultural Neighborhood Council)
- The Department of Neighborhood Empowerment (DONE)
- Urbanize.la or UrbanizeLA

Also, all emails TO and FROM:

- Rocky Delgadillo
- Matthew Nichols
- Alan Kumamoto
- Ron Fong
- Estela Lopez

Thank you.

Sincerely,
Katherine McNenny

P.S. This same information is also attached as a letter to this email.

...

Katherine McNenny

Co-founder, Director of Outreach & Education

Industrial District **Green**

A Project of **Community Partners**

@mean2**green**strz

industrial_district_green_la

Support the Skid Row Neighborhood Council-Formation Committee! skidrowneighborhoodcouncil.com

Attachments

- Chinatown BID Public Records Request 5-28-17.pdf (315.09KB)

Subject: Fw: This is a Public Records Request

From: [REDACTED]
To: info@chinatownla.com
Cc: [REDACTED]
Bcc: [REDACTED]
Date: Thursday, June 15, 2017 12:52:45 PM PDT

Hello Chinatown BID,

This is my **second request** for the below Public Records, now well after the 10 days the law allows for a response. I look forward to hearing from you soon.

Sincerely,
Katherine

----- Forwarded Message -----

From: Katherine McNenny [REDACTED]
To: "info@chinatownla.com" <info@chinatownla.com>
Cc: [REDACTED]
Sent: Sunday, May 28, 2017 4:17 PM
Subject: This is a Public Records Request

Hello,

This is a public records request for all emails (in electronic form only please) from January 1st 2017 to today, May 28th 2017 which include all mentions of:

- The Skid Row Neighborhood Council or The Skid Row Neighborhood Council Formation Committee
- Liner Law, Liner or Liner LLP
- Unite DTLA
- United DTLA
- United Downtown LA, LLC
- Rocky Delgadillo
- Matthew Nichols
- Chris Loos

- General Jeff or Jeff Page
- Katherine McNenny
- The Little Tokyo Lofts
- DLANC (The Downtown Los Angeles Neighborhood Council)
- The Downtown News or any reporter from the Downtown News
- The LA Times or any reporter from the LA Times
- HCNC (Historic Cultural Neighborhood Council)
- The Department of Neighborhood Empowerment (DONE)
- Urbanize.la or UrbanizeLA

Also, all emails TO and FROM:

- Rocky Delgadillo
- Matthew Nichols
- Alan Kumamoto
- Ron Fong
- Estela Lopez

Thank you.

Sincerely,
Katherine McNenny

P.S. This same information is also attached as a letter to this email.

...

Katherine McNenny

Co-founder, Director of Outreach & Education

[Industrial District Green](#)

A Project of [Community Partners](#)

[@mean2greenstrz](#)

[industrial_district_green_la](#)

Support the Skid Row Neighborhood Council-Formation Committee!

skidrowneighborhoodcouncil.com

Subject: Re: Fw: This is a Public Records Request

From: [REDACTED]

To: info@chinatownla.com

Date: Saturday, May 5, 2018 05:15:39 PM PDT

To Whom it May Concern,

On May 28th, 2017, I requested certain emails under the California Public Records Act. I received no response to my request. On June 15th, 2017, I sent a second request for the same emails. I have yet to receive any response to my two requests.

By ignoring my requests and withholding the requested records, you have violated the California Public Records Act. Please respond to this message immediately and provide the requested records promptly so this matter can be resolved without legal action.

In addition to responding to my previous request, please also provide records reflecting a list of the staff and/or the individuals who were authorized to conduct business on behalf of the BID during the period of my request, January 1st, 2017 – May 28th, 2017. This list should be the same as the list of individuals whose emails you search in order to respond to my initial request.

If you need any additional information from me to respond to my request, please contact me at your earliest convenience. Thank you for your assistance with this matter. It is my hope we can resolve this promptly.

Thank you.

Sincerely,
Katherine McNenny

...

Katherine McNenny



Co-founder, Director of Outreach & Education

[Industrial District Green](#)

A Project of [Community Partners](#)

[@mean2greenstrz](#)

[industrial_district_green_la](#)

Support the Skid Row Neighborhood Council-Formation Committee! skidrowneighborhoodcouncil.com

On Thursday, June 15, 2017 12:52:45 PM PDT, Katherine McNenny <katherine.trees@yahoo.com> wrote:

Hello Chinatown BID,

This is my **second request** for the below Public Records, now well after the 10 days the law allows for a response. I look forward to hearing from you soon.

Sincerely,
Katherine

----- Forwarded Message -----

From: Katherine McNenny <[REDACTED]>
To: "info@chinatownla.com" <info@chinatownla.com>
Cc: [REDACTED]
Sent: Sunday, May 28, 2017 4:17 PM
Subject: This is a Public Records Request

Hello,

This is a public records request for all emails (in electronic form only please) from January 1st 2017 to today, May 28th 2017 which include all mentions of:

- The Skid Row Neighborhood Council or The Skid Row Neighborhood Council Formation Committee
- Liner Law, Liner or Liner LLP
- Unite DTLA
- United DTLA
- United Downtown LA, LLC
- Rocky Delgadillo
- Matthew Nichols
- Chris Loos
- General Jeff or Jeff Page
- Katherine McNenny
- The Little Tokyo Lofts
- DLANC (The Downtown Los Angeles Neighborhood Council)
- The Downtown News or any reporter from the Downtown News
- The LA Times or any reporter from the LA Times

- HCNC (Historic Cultural Neighborhood Council)
- The Department of Neighborhood Empowerment (DONE)
- Urbanize.la or UrbanizeLA

Also, all emails TO and FROM:

- Rocky Delgadillo
- Matthew Nichols
- Alan Kumamoto
- Ron Fong
- Estela Lopez

Thank you.

Sincerely,
Katherine McNenny

P.S. This same informaiton is also attached as a letter to this email.

...

Katherine McNenny



Co-founder, Director of Outreach & Education

[Industrial District Green](#)

A Project of [Community Partners](#)

[@mean2greenstrz](#)

[industrial_district_green_la](#)

Support the Skid Row Neighborhood Council-Formation Committee!

skidrowneighborhoodcouncil.com

To whom it may concern,

On May 28, 2017, I requested certain emails under the California Public Records Act. I received no response to my request. On June 15, 2017, I sent a second request for the same emails. I have yet to receive any response to my two requests.

By ignoring my requests and withholding the requested records, you have violated the California Public Records Act. Please respond to this message immediately and provide the requested records promptly so this matter can be resolved without legal action.

In addition to responding to my previous request, please also provide records reflecting a list of the current staff and/or the individuals who are authorized to conduct business on behalf of the BID. This list should be the same as the list of individuals whose emails you search in order to respond to my initial request.

If you need any additional information from me to respond to my request, please contact me at your earliest convenience. Thank you for your assistance with this matter. It is my hope we can resolve this promptly.

Thank you.

7018 0360 0000 8539 7153

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postmark
Here

RECEIVED

Postage

\$

Total Postage and Fees

\$

JUL 23 2018

US 24/7 POSTAL CENTER

Sent To

CHINATOWN BUSINESS IMPROVEMENT DISTRICT

Street and Apt. No., or PO Box No.

121 N. BROADWAY SUITE 208

City, State, ZIP+4®

LOS ANGELES, CA 90012

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

US 24/7 Postal Center

9854 National Blvd.

Los Angeles, CA 90034

TEL (310) 559-1393

FAX (310) 559-1394

www.us247postal.com

9854national@gmail.com

USPS First Class Mail 4.64

Track #: 70180360000085397153

Envelope 0.25 TX

SUBTOTAL 5.09

TAX

CA Sales Tax on 0.25 0.02

TOTAL 5.11

TEND Cash 10.11

CHANGE 5.00

Total shipments: 0

Customer: None selected

07/23/2018

#347805

01:42 PM

Workstation: 10 - Auxiliary Workstation 10

STORE HOURS:

MON-FRI 9:00AM - 6:00PM

SAT 10:00AM - 3:00PM

SUN CLOSED

Subject: CPRA request

From: [REDACTED]

To: info@chinatownla.com

Date: Wednesday, July 25, 2018 10:43:24 PM PDT

To Whom It May Concern,

On May 28, 2017, I requested certain emails under the California Public Records Act. I received no response to my request. On June 15, 2017, I sent a second request for the same emails. I have yet to receive any response to my two requests.

By ignoring my requests and withholding the requested records, you have violated the California Public Records Act. Please respond to this message immediately and provide the requested records promptly so this matter can be resolved without legal action.

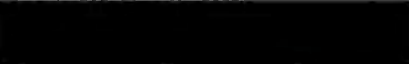
In addition to responding to my previous request, please also provide records reflecting a list of the current staff and/or the individuals who are authorized to conduct business on behalf of the BID. This list should be the same as the list of individuals whose emails you search in order to respond to my initial request.

If you need any additional information from me to respond to my request, please contact me at your earliest convenience. Thank you for your assistance with this matter. It is my hope we can resolve this promptly.

Sincerely,
Katherine

...

Katherine McNenny



Co-founder, Director of Outreach & Education

[Industrial District Green](#)

A Project of [Community Partners](#)

[@mean2greenstrz](#)

[industrial_district_green_la](#)

Support the Skid Row Neighborhood Council-Formation Committee! skidrowneighborhoodcouncil.com

EXHIBIT B

Subject: CPRA request (CBID.2018.03.23.a)
From: adrian@internet-mail.org
Date: 03/23/2018 08:20 AM
To: info@chinatownla.com, geoyu28@aol.com

Greetings, Chinatown BID friends!

I would like to see copies of the following material:

1. All emails between anyone on the CBID board or staff and anyone at lacity.org
2. All emails between anyone on the CBID board or staff and anyone at lapd.online
3. All emails in the possession of anyone on the CBID board or staff that contain the word "Skid".
4. All emails between anyone on the CBID board or staff and anyone at any of the domains:
 - a. hollywoodbid.org
 - b. ccala.org
 - c. historiccore.bid
 - d. downtownla.com
 - e. centralcityeast.org
 - f. eppla.com
 - g. kindelgagan.com
 - h. linerlaw.com
 - i. gslawla.com
 - j. devine-strategies.com
5. All emails between anyone on the CBID board or staff and the following email addresses:
 - a. beatus821@gmail.com
 - b. jesslall@gmail.com
 - c. renamastenleddy@yahoo.com
 - d. blairbesten@gmail.com
 - e. joshraymd@gmail.com
 - f. ellenendo@yahoo.com
 - g. jkumamoto@aol.com
 - h. robertnewman2@gmail.com

I need to see these emails from January 1, 2017 through date of compliance.

Please note that "between" means "TO/FROM/CC/BCC." Also, please note that I need to see these emails in a native email format as required by the CPRA at Section 6253.9(a)(1). Native email formats are EML, MSG, MBOX, or PST. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

Finally, please note that a version of a given email in one mailbox is distinct from a version in a different mailbox. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each staff account through which BID business is conducted and each board member account through which BID business is conducted. Also, as you probably know, as long as BID business is conducted through an email account the records relating to that business are public records even if the owner of the account considers it to be a private account.

Thank you for your anticipated cooperation, and I look forward to hearing from you within statutory deadlines.

Adrian Riskin

Subject: Re: CPRA request (CBID.2018.03.23.a)
From: adrian@internet-mail.org
Date: 04/06/2018 10:02 PM
To: info@chinatownla.com, geoyu28@aol.com

Good evening, Mr. Yu.

I'm wondering about the status of this request. A response was due on Monday.

Thanks for your assistance,

Adrian Riskin

On Fri, Mar 23, 2018, at 8:20 AM, adrian@internet-mail.org wrote:

Greetings, Chinatown BID friends!

I would like to see copies of the following material:

1. All emails between anyone on the CBID board or staff and anyone at lacity.org
2. All emails between anyone on the CBID board or staff and anyone at lapd.online
3. All emails in the possession of anyone on the CBID board or staff that contain the word "Skid".
4. All emails between anyone on the CBID board or staff and anyone at any of the domains:
 - a. hollywoodbid.org
 - b. ccala.org
 - c. historiccore.bid
 - d. downtownla.com
 - e. centralcityeast.org
 - f. epgla.com
 - g. kindelgagan.com
 - h. linerlaw.com
 - i. gslawla.com
 - j. devine-strategies.com
5. All emails between anyone on the CBID board or staff and the following email addresses:
 - a. beatus821@gmail.com
 - b. jesslall@gmail.com
 - c. renamastenleddy@yahoo.com
 - d. blairbesten@gmail.com
 - e. joshraymd@gmail.com
 - f. ellenendo@yahoo.com
 - g. jkumamoto@aol.com
 - h. robertnewman2@gmail.com

I need to see these emails from January 1, 2017 through date of compliance.

Please note that "between" means "TO/FROM/CC/BCC." Also, please note that I need to see these emails in a native email format as required by the CPRA at Section 6253.9(a)(1). Native email formats are EML, MSG, MBOX, or PST. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in

native format their attachments are automatically included in native format.

Finally, please note that a version of a given email in one mailbox is distinct from a version in a different mailbox. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each staff account through which BID business is conducted and each board member account through which BID business is conducted. Also, as you probably know, as long as BID business is conducted through an email account the records relating to that business are public records even if the owner of the account considers it to be a private account.

Thank you for your anticipated cooperation, and I look forward to hearing from you within statutory deadlines.

Adrian Riskin

Subject: Re: CPRA request (CBID.2018.03.23.a)
From: adrian@internet-mail.org
Date: 06/07/2018 04:37 PM
To: info@chinatownla.com, geoyu28@aol.com

Good evening, Mr. Yu.

I'm wondering about the status of this request.

Thanks,

Adrian

On Fri, Apr 6, 2018, at 10:02 PM, adrian@internet-mail.org wrote:

Good evening, Mr. Yu.

I'm wondering about the status of this request. A response was due on Monday.

Thanks for your assistance,

Adrian Riskin

On Fri, Mar 23, 2018, at 8:20 AM, adrian@internet-mail.org wrote:

Greetings, Chinatown BID friends!

I would like to see copies of the following material:

1. All emails between anyone on the CBID board or staff and anyone at lacity.org
2. All emails between anyone on the CBID board or staff and anyone at lapd.online
3. All emails in the possession of anyone on the CBID board or staff that contain the word "Skid".
4. All emails between anyone on the CBID board or staff and anyone at any of the domains:
 - a. hollywoodbid.org
 - b. ccala.org
 - c. historiccore.bid
 - d. downtownla.com
 - e. centralcityeast.org
 - f. epgla.com
 - g. kindelgagan.com
 - h. linerlaw.com
 - i. gslawla.com
 - j. devine-strategies.com
5. All emails between anyone on the CBID board or staff and the following email addresses:
 - a. beatus821@gmail.com
 - b. jesslall@gmail.com
 - c. renamastenleddy@yahoo.com
 - d. blairbesten@gmail.com
 - e. joshraymd@gmail.com
 - f. ellenendo@yahoo.com
 - g. jkumamoto@aol.com

h. robertnewman2@gmail.com

I need to see these emails from January 1, 2017 through date of compliance.

Please note that "between" means "TO/FROM/CC/BCC." Also, please note that I need to see these emails in a native email format as required by the CPRA at Section 6253.9(a)(1). Native email formats are EML, MSG, MBOX, or PST. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

Finally, please note that a version of a given email in one mailbox is distinct from a version in a different mailbox. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each staff account through which BID business is conducted and each board member account through which BID business is conducted. Also, as you probably know, as long as BID business is conducted through an email account the records relating to that business are public records even if the owner of the account considers it to be a private account.

Thank you for your anticipated cooperation, and I look forward to hearing from you within statutory deadlines.

Adrian Riskin

EXHIBIT C

Subject: CPRA request (CBID.2018.03.31.a)
From: adrian@internet-mail.org
Date: 03/31/2018 01:31 PM
To: info@chinatownla.com, geoyu28@aol.com

Greetings, Chinatown BID friends!

I would like to see copies of the following material:

1. All emails between anyone on the CBID board or staff and the email address michaelkfong@gmail.com .

I need to see these emails from January 1, 2015 through date of compliance.

Please note that "between" means "TO/FROM/CC/BCC." Also, please note that I need to see these emails in a native email format as required by the CPRA at Section 6253.9(a)(1). Native email formats are EML, MSG, MBOX, or PST. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

Finally, please note that a version of a given email in one mailbox is distinct from a version in a different mailbox. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each staff account through which BID business is conducted and each board member account through which BID business is conducted. Also, as you probably know, as long as BID business is conducted through an email account the records relating to that business are public records even if the owner of the account considers it to be a private account.

Thank you for your anticipated cooperation, and I look forward to hearing from you within statutory deadlines.

Adrian Riskin

Subject: Re: CPRA request (CBID.2018.03.31.a)
From: adrian@internet-mail.org
Date: 04/11/2018 11:47 PM
To: info@chinatownla.com, geoyu28@aol.com

Good evening, Mr. Yu.

I'm just wondering what the status of this request might be.

Thanks for your help,

Adrian

On Sat, Mar 31, 2018, at 1:31 PM, adrian@internet-mail.org wrote:

Greetings, Chinatown BID friends!

I would like to see copies of the following material:

1. All emails between anyone on the CBID board or staff and the email address michaelkfong@gmail.com .

I need to see these emails from January 1, 2015 through date of compliance.

Please note that "between" means "TO/FROM/CC/BCC." Also, please note that I need to see these emails in a native email format as required by the CPRA at Section 6253.9(a)(1). Native email formats are EML, MSG, MBOX, or PST. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

Finally, please note that a version of a given email in one mailbox is distinct from a version in a different mailbox. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each staff account through which BID business is conducted and each board member account through which BID business is conducted. Also, as you probably know, as long as BID business is conducted through an email account the records relating to that business are public records even if the owner of the account considers it to be a private account.

Thank you for your anticipated cooperation, and I look forward to hearing from you within statutory deadlines.

Adrian Riskin

Subject: Re: CPRA request (CBID.2018.03.31.a)
From: adrian@internet-mail.org
Date: 06/07/2018 04:38 PM
To: info@chinatownla.com, geoyu28@aol.com

Good evening, Mr. Yu.

I'm wondering about the status of this request.

Thanks,

Adrian

On Wed, Apr 11, 2018, at 11:47 PM, adrian@internet-mail.org wrote:

Good evening, Mr. Yu.

I'm just wondering what the status of this request might be.

Thanks for your help,

Adrian

On Sat, Mar 31, 2018, at 1:31 PM, adrian@internet-mail.org wrote:

Greetings, Chinatown BID friends!

I would like to see copies of the following material:

1. All emails between anyone on the CBID board or staff and the email address michaelkfong@gmail.com .

I need to see these emails from January 1, 2015 through date of compliance.

Please note that "between" means "TO/FROM/CC/BCC." Also, please note that I need to see these emails in a native email format as required by the CPRA at Section 6253.9(a)(1). Native email formats are EML, MSG, MBOX, or PST. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

Finally, please note that a version of a given email in one mailbox is distinct from a version in a different mailbox. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each staff account through which BID business is conducted and each board member account through which BID business is conducted. Also, as you probably know, as long as BID business is conducted through an email account the records relating to that business are public records even if the owner of the account considers it to be a private account.

Thank you for your anticipated cooperation, and I look forward to hearing from you within statutory deadlines.

Adrian Riskin

EXHIBIT D

Subject: CPRA request (CBID.2018.03.31.b)
From: adrian@internet-mail.org
Date: 03/31/2018 05:23 PM
To: info@chinatownla.com, geoyu28@aol.com

Greetings, Chinatown BID friends!

I would like to see copies of the following material:

1. All emails between anyone on the CBID board or staff and anyone at the domain marvimon.com .

I need to see these emails from January 1, 2015 through date of compliance.

Please note that "between" means "TO/FROM/CC/BCC." Also, please note that I need to see these emails in a native email format as required by the CPRA at Section 6253.9(a)(1). Native email formats are EML, MSG, MBOX, or PST. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

Finally, please note that a version of a given email in one mailbox is distinct from a version in a different mailbox. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each staff account through which BID business is conducted and each board member account through which BID business is conducted. Also, as you probably know, as long as BID business is conducted through an email account the records relating to that business are public records even if the owner of the account considers it to be a private account.

Thank you for your anticipated cooperation, and I look forward to hearing from you within statutory deadlines.

Adrian Riskin

Subject: Re: CPRA request (CBID.2018.03.31.b)
From: adrian@internet-mail.org
Date: 04/11/2018 11:47 PM
To: info@chinatownla.com, geoyu28@aol.com

Good evening, Mr. Yu.

I'm just wondering what the status of this request might be.

Thanks for your help,

Adrian

On Sat, Mar 31, 2018, at 5:23 PM, adrian@internet-mail.org wrote:

Greetings, Chinatown BID friends!

I would like to see copies of the following material:

1. All emails between anyone on the CBID board or staff and anyone at the domain marvimon.com .

I need to see these emails from January 1, 2015 through date of compliance.

Please note that "between" means "TO/FROM/CC/BCC." Also, please note that I need to see these emails in a native email format as required by the CPRA at Section 6253.9(a)(1). Native email formats are EML, MSG, MBOX, or PST. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

Finally, please note that a version of a given email in one mailbox is distinct from a version in a different mailbox. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each staff account through which BID business is conducted and each board member account through which BID business is conducted. Also, as you probably know, as long as BID business is conducted through an email account the records relating to that business are public records even if the owner of the account considers it to be a private account.

Thank you for your anticipated cooperation, and I look forward to hearing from you within statutory deadlines.

Adrian Riskin

Subject: Re: CPRA request (CBID.2018.03.31.b)
From: adrian@internet-mail.org
Date: 06/07/2018 04:38 PM
To: info@chinatownla.com, geoyu28@aol.com

Good evening, Mr. Yu.

I'm wondering about the status of this request.

Thanks,

Adrian

On Wed, Apr 11, 2018, at 11:47 PM, adrian@internet-mail.org wrote:

Good evening, Mr. Yu.

I'm just wondering what the status of this request might be.

Thanks for your help,

Adrian

On Sat, Mar 31, 2018, at 5:23 PM, adrian@internet-mail.org wrote:

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1. All emails between anyone on the CBID board or staff and anyone at the domain marvimon.com .

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Please note that "between" means "TO/FROM/CC/BCC." Also, please note that I need to see these emails in a native email format as required by the CPRA at Section 6253.9(a)(1). Native email formats are EML, MSG, MBOX, or PST. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

Finally, please note that a version of a given email in one mailbox is distinct from a version in a different mailbox. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each staff account through which BID business is conducted and each board member account through which BID business is conducted. Also, as you probably know, as long as BID business is conducted through an email account the records relating to that business are public records even if the owner of the account considers it to be a private account.

Thank you for your anticipated cooperation, and I look forward to hearing from you within statutory deadlines.

Adrian Riskin

EXHIBIT E

7017 1000 0001 1146 2083

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

LOS ANGELES, CA 90012

Certified Mail Fee	\$3.45
Extra Services & Fees (check box, add fee as appropriate)	\$2.75
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$0.50

Total Postage and Fees \$6.70

Sent To

Street and Apt. No., or PO Box No.

City, State, ZIP+4®

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

0051
09

Postmark
Here

04/26/2018

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

LA ABC
727 N Broadway
ste 208
LA CA 90012



9590 9402 2896 7094 6168 66

2. Article Number

7017 1000 0001 1146 2083

COMPLETE THIS SECTION ON DELIVERY**A. Signature**☒ X

- ☐ Agent
- ☐ Addressee

B. Received by (Printed Name)**C. Date of Delivery**

4-28-18

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No**3. Service Type**

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | <input type="checkbox"/> Signature Confirmation™ |
| | <input type="checkbox"/> Signature Confirmation Restricted Delivery |

EXHIBIT F

Full text of "United Downtown Los Angeles Emails from March and April 2017"

See other formats

RE: ^IMPORTANT UPDATE** Skid Row Neighbo...

Subject: RE: ^IMPORTANT UPDATE** Skid Row Neighborhood Council
From: Jessica Lall <jlall@ccala.org>

Date: 03/22/2017 09:01 AM

To: Samko General Partnership <samkogp@sbcglobal.net>, Scott Gray <scott@capitalforesight.com>, Estela Lopez <beatus821@gmail.com>, "kent hawkins" <kent@statewideacqcorp.com>, Elizabeth Peterson <elizabeth@epgla.com>, Jenni Harris <jharris@atlas-cap.com>, Carolyn Leslie <cleslie@atlas-cap.com>, Joanne <jkumamoto@aol.com>, "akumamoto@aol.com" <akumamoto@aol.com>, Ellen Endo <ellenendo@yahoo.com>, Josh Albrektson <joshraymd@gmail.com>, John Howland <jhowland@ccala.org>, Nick Griffin <ngriffin@downtownla.com>, Carol Schatz <cschatz@downtownla.com>, "Marie Rumsey" <mrumsey@ccala.org>, "blairbesten@gmail.com" <blairbesten@gmail.com>, "robertnewman2@gmail.com" <robertnewman2@gmail.com>, Rena Leddy <rena@fashiondistrict.org>, "dan.curnow@gmail.com" <dan.curnow@gmail.com>, Relissa <relissagreer@yahoo.com>, "jc@downtownventure.com" <jc@downtownventure.com>, Karen Christopherson <Karen@aimanagementco.com>, "shirley@seawin.com"

<shirley@seawin.com>, Merle Ojiri <MOjiri@yamasafishcake.com>, "rose.park@lanystyle.com" <rose.park@lanystyle.com>, "miguel@marvimon.com" <miguel@marvimon.com>, "nasirk@sbcglobal.net" <nasirk@sbcglobal.net>, Tanner Blackman <tblackman@kindelgagan.com>, George Yu <geoyu28@aol.com>, "Charlie@megatoys.com" <Charlie@megatoys.com>, Peklar Pilavjian <pekлар@live.com>, "steve.lee@steleeind.com" <steve.lee@steleeind.com>, DTCommissary <dtcommissary@gmail.com>, Bob Smiland <bsmiland@inner-cityarts.org>, Dilip Bhavnani <dilip@sunscopeusa.com>, "Don Steier" <donsteier@gslawla.com>, Drew Bauer <DrewBauer@youngsholdings.com>, Ernie Doizaki

<edoizaki@kansasmarine.com>, Howard Klein

<howard.klein@oceanbeauty.com>, Larry Rauch <lrauch@lacold.com>, "Mark Shinbane" <marks@ore-cal.com>, Matt Klein <mklein@hbkinv.com>

CCA will be there. Thank you!

From: Samko General Partnership [mailto:samkogp@sbcglobal.net]

Sent: Tuesday, March 21, 2017 7:07 PM

To: Scott Gray <scott@capitalforesight.com>; Estela Lopez <beatus821@gmail.com>; kent hawkins <kent@statewideacqcorp.com>; Elizabeth Peterson <elizabeth@epgla.com>; Jenni Harris <jharris@atlas-cap.com>; Carolyn Leslie <cleslie@atlas-cap.com>; Joanne <jkumamoto@aol.com>; akumamoto@aol.com; Ellen Endo <ellenendo@yahoo.com>; Josh Albrektson <joshraymd@gmail.com>; John Howland <jhowland@ccala.org>; Nick Griffin <ngriffin@downtownla.com>; Carol Schatz <cschatz@downtownla.com>; Jessica Lall <jlall@ccala.org>; Marie Rumsey <mrumsey@ccala.org>; blairbesten@gmail.com; robertnewman2@gmail.com; Rena Leddy <rena@fashiondistrict.org>; dan.curnow@gmail.com; Relissa <relissagreer@yahoo.com>; jc@downtownventure.com; Karen Christopherson <Karen@aimanagementco.com>; shirley@seawin.com; Merle Ojiri

1 of 4

11/05/2017 03:18 PM

RE: ^IMPORTANT UPDATE** Skid Row Neighbo...

<MOjiri@yamasafishcake.com>; rose.park@lanystyle.com; miguel@marvimon.com; nasirk@sbcglobal.net; Tanner Blackman <tblackman@kindelgagan.com>; George Yu <geoyu28@aol.com>; Charlie@megatoys.com; Peklar Pilavjian <pekлар@live.com>; steve.lee@steleeind.com; DTCommissary <dtcommissary@gmail.com>; Bob Smiland <bsmiland@inner-cityarts.org>; Dilip Bhavnani <dilip@sunscopeusa.com>; Don Steier <donsteier@gslawla.com>; Drew Bauer <DrewBauer@youngsholdings.com>; Ernie Doizaki <edoizaki@kansasmarine.com>; Howard Klein

<howard.klein@oceanbeauty.com>; Larry Rauch <lrauch@lacold.com>; Mark Shinbane <marks@ore-cal.com>; Matt Klein <mklein@hbkinv.com>

Subject: Re: ^IMPORTANT UPDATE** Skid Row Neighborhood Council

Hi Estella,

I have a:

2014 Black
Toyota Camry
LN 7CLJ723

Thank you,

Kathleen Damani
GM

SAMKO LLC

208 E. 6th Street #A-11

Los Angeles, CA 90014

213-489-4372

samkogp@sbcglobal.net

On Tuesday, March 21, 2017 5:07 PM, Scott Gray < scott@capitalforesight.com > wrote:

There are also City Public Lots on N. Los Angeles at the Mall and on Judge John Also Street,
between Temple and 1 st .

Scott W Gray

Director of Operations
Capital Foresight
0:310-234-9598
C: 909-586-0000

From: Estela Lopez [mailto: beatus821 @gmail.com]
Sent: Tuesday, March 21, 2017 4:53 PM

To: 'Samko General Partnership'; 'kent hawkins'; 'Elizabeth Peterson'; 'Jenni Harris'
; 'Carolyn Leslie'; 'Joanne';
akumamoto@aol.com ; 'Ellen Endo'; 'Josh Albrektson'; 'John Howland'; 'Nick Griffin';
'Carol Schatz'; 'Jessica

2 of 4

11/05/2017 03:18 PM

RE: ^IMPORTANT UPDATE** Skid Row Neighbo...

Lall'; 'Marie Rumsey'; blairbesten@gmail.com; robertnewman2@gmail.com ; 'Rena Leddy'; dan.curnow@gmail.com ; 'Relissa'; ic@downtownventure.com ; 'Karen Christopherson'; shirlev@seawin.com;
'Merle Ojiri'; rose.park@lanvstvl.com : miquel@marvimon.com ; nasirk@sbcglobal.net : 'Tanner Blackman';
'George Yu'; Charlie@Meqatovs.com; 'Peklar Pilavjian'; steve.lee@steleeind.com : 'DTC ommissary';
scott@capitalforesight.com ; 'Bob Smiland'; 'Dilip Bhavnani'; 'Don Steier'; 'Drew Bauer'; 'Ernie Doizaki'; 'Howard Klein'; 'Larry Rauch'; 'Mark Shinbane'; 'Matt Klein'

Subject: RE: "IMPORTANT UPDATE** Skid Row Neighborhood Council

Kathleen, thanks for asking the question. I just checked with the Council office and they will make arrangements for us.

Everyone: please send me ASAP your car info (make, model, license) and I will submit it to the Council office. See parking directions attached.

From: Samko General Partnership [mailto:samkoqp@sbcglobal.net]
Sent: Tuesday, March 21, 2017 4:11 PM

To: Estela Lopez; 'kent hawkins'; 'Elizabeth Peterson'; 'Jenni Harris'; 'Carolyn Leslie'; 'Joanne';
akumamoto@aol.com ; 'Ellen Endo'; Josh Albrektson; 'John Howland'; 'Nick Griffin'; 'Carol Schatz';
'Jessica Lall'; 'Marie Rumsey'; blairbesten@gmail.com ; robertnewman2@gmail.com ; 'Rena Leddy';
dan.curnow@gmail.com ; 'Relissa'; ic@downtownventure.com ; 'Karen Christopherson'; shirlev@seawin.com ; 'Merle Ojiri'; rose.park@lanvstvl.com ; miquel@marvimon.com ; nasirk@sbcglobal.net : 'Tanner Blackman'; 'George Yu'; Charlie@Meoatovs.com ; 'Peklar Pilavjian';
steve.lee@steleeind.com ; 'DTCommissary'; scott@capitalforesight.com ; Bob Smiland; Dilip Bhavnani; Don Steier; Drew Bauer; Ernie Doizaki; Howard Klein; Larry Rauch; Mark Shinbane; Matt Klein

Subject: Re: "IMPORTANT UPDATE** Skid Row Neighborhood Council

I will be there. Is parking there at City Hall for evening meetings?

Kathleen Damani
GM

SAMKO LLC

208 E. 6th Street #A-11

Los Angeles, CA 90014

213-489-4372

samkogp@sbcglobal.net

On Tuesday, March 21, 2017 2:54 PM, Estela Lopez < beatus821@gmail.com > wrote:

3 of 4

11/05/2017 03:18 PM

RE: ^IMPORTANT UPDATE** Skid Row Neighbo...

Everyone,

Councilman Huizaras office is receiving your feedback on this issue. Your calls and e mails
are definitely being noted.

UPDATE: The City Council Rules & Elections committee has just added a special 5:30pm meeting for TOMORROW to discuss online voting for the Skid Row Neighborhood Council election. Councilmember Huizar is a member of this committee and will be present..

We need you at this meeting

This is an important opportunity to provide the same testimony as yesterday. This election
process has not been open and transparent, the outreach was not inclusive, and the majority
of those who will be affected by the outcome had no knowledge of the proposal. Online voting is only one aspect of a fair neighborhood council election.

I have attached the Council committee agenda. We need a strong and representative group
to appear and testify. Again, if it is helpful, we can provide transportation to City Hall from
our office.

Cordially,

Estela Lopez

Downtown Industrial District BID
725 Crocker St.

Los Angeles, CA 90021
213-228-8484

4 of 4

11/05/2017 03:18 PM

Full text of "United Downtown Los Angeles Emails from March and April 2017"

[See other formats](#)

Re: ^IMPORTANT UPDATE** Skid Row Neighbo...

Subject: Re: **IMPORTANT UPDATE** Skid Row Neighborhood Council
From: Karen Christopherson <Karen@aimanagementco.com>

Date: 04/03/2017 01:42 PM

To: Jacob - Brokerage <jacob@newdowntownbrokerage.com>

CC: Christopher Loos <chris@urbanize.la>, Dilip Bhavnani <dilip@sunscopeusa.com>, "shirley@seawin.com" <shirley@seawin.com>, "Carolyn Leslie" <cleslie@atlas-cap.com>, Jessica Lall <jlall@ccala.org>, Joanne <jkumamoto@aol.com>, "hal@halbastian.com" <hal@halbastian.com>, DTCommissary <dtcommissary@gmail.com>, kent hawkins <kent@statewideacqcorp.com>, "Merle Ojiri" <mojiri@yamasafishcake.com>, Samko General Partnership <samkogp@sbcglobal.net>, Marie Rumsey <mrumsey@ccala.org>, George Yu <geoyu28@aol.com>, Jenni Harris <jhharris@atlas-cap.com>, Howard Klein <howard.klein@oceanbeauty.com>, Elizabeth Peterson <elizabeth@epgla.com>, Scott Gray <scott@capitalforesight.com>, "rdelgadillo@linerlaw.com" <rdelgadillo@linerlaw.com>, miguel nelson <miguel@marvimon.com>, Carol Schatz <cschatz@downtownla.com>, relissa greer <relissagreer@yahoo.com>, Tom Gilmore <tgilmore@gilmoredev.com>, "steve.lee@steleeind.com" <steve.lee@steleeind.com>, Dan Curnow <dan.curnow@gmail.com>, Matt Klein <mklein@hbkinv.com>, Peklar Pilavjian <pekлар@live.com>, Estela Lopez <beatu821@gmail.com>, Ellen Endo <ellenendo@yahoo.com>, "jc@downtownventure.com" <jc@downtownventure.com>, Bob Smiland <bsmiland@inner-cityarts.org>, Ernie Doizaki <edoizaki@kansasmarine.com>, Nick Griffin <ngriffin@downtownla.com>, Michael Gagan <mgagan@kindelgagan.com>, Tanner Blackman <tblackman@kindelgagan.com>, "James Kang" <james.kang@steleeind.com>, Drew Bauer <drewbauer@youngsholdings.com>, Larry Rauch <lrauch@lacold.com>, Rena Leddy <renamastenleddy@yahoo.com>, Melissa Martinez <melissa@superiorseafoodco.com>, Blair Best <blairbesten@gmail.com>, Mark Shinbane <marks@ore-cal.com>, "nasirk@sbcglobal.net" <nasirk@sbcglobal.net>, "daniel@jadeent.com"

<daniel@jadeent.com>, Josh Albrektson <joshraymd@gmail.com>, Don Steier <donsteier@gslawla.com>, Steven Sharp <ssharp@kindelgagan.com>, "robertnewman2@gmail.com" <robertnewman2@gmail.com>, Charlie Woo <charlie@megatoys.com>, "rose.park@lanystyle.com" <rose.park@lanystyle.com>

Haha oops! I meant NO

Sent from my iPhone

On Apr 3, 2017, at 1:17 PM, Jacob - Brokerage <iacob@newdowntownbrokerage.com> wrote:

Thank you Karen but I certainly hope you mean no voters.

1 of 6

11/05/2017 03:12 PM

Re: ^IMPORTANT UPDATE** Skid Row Neighbo...

Get Outlook for iOS

On Mon, Apr 3, 2017 at 1:05 PM -0700, "Karen Christopherson" <Karen@aimanagementco.com> wrote:

There is also a pop up at 420 E. 3rd in Little Tokyo. It is on the corner of San Pedro and 3rd tomorrow from 1:00 to 4:00. I will tell security to validate you if you ask for one. We would love to only validate yes voters
5

Sent from my iPhone

On Apr 3, 2017, at 9:08 AM, " iacob@newdowntownbrokerage.com " <iacob@newdowntownbrokerage.com> wrote:

As am I. I had to re-register as my last registration was attached to a dead email. We have challenges being prepped due to the number of times online voting went down. In the mean time we need to focus on the pop-up up polls.

Today is the poll at CCEA. Estella has arranged transportation for her

owners to bring in people.

Robert Newman is on a call as we speak working to get an additional pop up at the Hill Street Jewelry Center

The 4th and Main popup on Wednesday if where we need to deliver from the Historic Core. It is from 12-3 at the Medallion apartments. We need as much assistance as possible here. If you have staff please give them some time to get to this poll. According to the data I am working with our target here needs to be 500 to counter what they bring on the 6th.

Please let me know if I can give anyone any assistance. Reach out on my cell at 3103218818.

Best,

Jacob Van Horn
New Downtown Brokerage
453 South Spring Street
Suite #1023

Los Angeles, California 90013
D 213-232-1617 C 310-321-8818
iacob@newdowntownbrokerage.com

2 of 6

11/05/2017 03:12 PM

Re: ^IMPORTANT UPDATE** Skid Row Neighbo...

www.newdowntownbrokerage.com

<untitled>

Signature deals that improve the community by bridging the transactions gap.

NOTICE: This e-mail message and any attachments are intended solely for the use of the intended recipient, and may contain information that is confidential, privileged and exempt from disclosure under applicable law. If you are not the intended recipient, you are not permitted to read, disclose, reproduce, distribute, use or take any action in reliance upon this message and any attachments, and we request that you promptly notify the sender and immediately delete this message and any attachments as well as any copies thereof. Delivery of this message to an unintended recipient is not intended to waive any right or privilege. New Downtown Brokerage is neither qualified nor authorized to give legal or tax advice, and any such advice should be obtained from an appropriate, qualified professional adviser of your own choosing.

-Original Message-

Subject: RE: ^IMPORTANT UPDATE** Skid Row Neighborhood Council

From: "Scott Gray" <scott@capitalforesiaht.com >

Date: 4/3/17 8:56 am

To: "Karen Christopherson" <Karen@aimanagementco.com >.
"Estela Lopez" <beatus821@gmail.com >.
rdelqadillo@linerlaw.com

Cc: "kent hawkins" <kent@statewideacqcorp.com >. "Elizabeth Peterson" <elizabeth@epqla.com >. "Jenni Harris" <iharris@atlas-cap.com >. "Carolyn Leslie" <cleslie@atlas-cap.com >. "Joanne" <ikumamoto@aol.conn >. "Ellen Endo" <ellenendo@vahoo.com >. "Josh Albrektson"

<joshravmd@gmail.com >. "Nick Griffin" <ngriffin@downtownla.com >. "Blair Best" <blairbesten@gmail.com >. robertnewman2@gmail.com. "Rena Leddy" <renamastenleddv@vahoo.com >. "Dan Curnow" <dan.curnow@gmail.com >. "relissa greer"

<rel issagreer@vahoo.com >. "Melissa Martinez" <melissa@superiorseafoodco.com >.

, "Samko General Partnership"

<samkoqp@sbcqlobal.net >. shirlev@seawin.com . "Merle Ojiri" <MOiiri@vamasafishcake.com >. rose.park@lanvstvle.com.

11/05/2017 03:12 PM

Re: ^IMPORTANT UPDATE** Skid Row Neighbo...

"miguel nelson" <miquel@marvimon.com>,
nasirk@sbcglobal.net . "Jessica Lall" <ILall@ccala.ora>. "Marie
Rumsey" <mrumsev@ccala.org>. "Tanner Blackman"
<tblackman@kindelqaqan.com>. "George Yu"
<qeovu28@aol.com>. "Charlie Woo"

<charlie@meqatovs.com>. "Peklar Pilavjian"
<pekлар@live.com>. daniel@iadeent.com. Hal@halbastian.com ,

steve.lee@steleeind.com. "Steven Sharp"
< ssharp@kindelqaqan.com >. "Michael Gagan"
< mqaqan@kindelqaqan.com >. "Christopher Loos"
< chris@urbanize.la >. "James Kang"

< iames.kanq@steleeind.com >, "Tom Gilmore"
< TGilmore@gilmoredev.com >. "Carol Schatz"
< cschatz@downtownla.com >. "DTCommissary"

< dtcommissa rv@gmail.com >,
iacob@newdowntownbrokerage.com . "Bob Smiland"
< bsmiland@inner-citvarts.org >. "Dilip Bhavnani"
< dilip@sunscopeusa.com >. "Don Steier"
< donsteier@qslawla.com >. "Drew Bauer"
< DrewBauer@vounasholdinas.com >. "Ernie Doizaki"
< edoizaki@kansasmarine.com >. "Howard Klein"
< howard.klein@oceanbeautv.com >. "Larry Rauch"
< lrauch@lacold.com >. "Mark Shinbane" < marks@ore-
cal.com >. "Matt Klein" < mklein@hbkinv.com >

It is Monday morningail am still waiting for my approval and PIN
to vote.

Scott W Gray

Director of Operations
Capital Foresight
O: 310-234-9598
C: 909-586-0000

From: Karen Christopherson [mailto: Karen@aimanaqementco.com]

Sent: Saturday, April 01, 2017 9:29 PM
To: Estela Lopez

Cc: kent hawkins; Elizabeth Peterson; Jenni Harris; Carolyn Leslie; Joanne;

4 of 6

11/05/2017 03:12 PM

Re: ^IMPORTANT UPDATE** Skid Row Neighbo...

Ellen Endo; Josh Albrektson; Nick Griffin; Blair Best;
robertnewman2@qmail.com ; Rena Leddy; Dan Curnow; relissa greer;

Melissa Martinez; ic@downtownventure.com ; Samko General Partnership;
shirley@seawin.com ; Merle Ojiri; rose.park@lanystyle.com ; miguel nelson;
nasirk@sbcglobal.net ; Jessica Lall; Marie Rumsey; Tanner Blackman; George
Yu; Charlie Woo; Peklar Pilavjian; daniel@jadeent.com ; Hal@halbastian.com ;
steve.lee@steleeind.com ; Steven Sharp; Michael Gagan; Christopher Loos;
James Kang; Tom Gilmore; Scott Gray; Carol Schatz; DTCommissary;
iacob@newdowntownbrokerage.com ; Bob Smiland; Dilip Bhavnani; Don
Steier; Drew Bauer; Ernie Doizaki; Howard Klein; Larry Rauch; Mark
Shinbane; Matt Klein

Subject: Re: **IMPORTANT UPDATE** Skid Row Neighborhood Council

I registered on Thursday, got an email confirming that I had registered and was told I would get another email once my information was confirmed so that I could vote. Still nothing

Sent from my iPhone

On Apr 1, 2017, at 9:21 PM, Estela Lopez
< beatus821@q mail .com > wrote:

Everyone,

The online registration portal is directing to a page that says registration is now closed. Online registration was to remain open until 11:59pm tomorrow. Several reports of persons wanting to register and being unable to do so. Thanks to Jacob Van Horn for identifying a possible awork around.a This link takes you to the registration required fields. If you or anyone you know still needs to register, try this link and let us know if it works:

<https://empowerla.everyonecounts.com>

/app/10027/23399?i = 1491106439

5 of 6

11/05/2017 03:12 PM

Re: ^IMPORTANT UPDATE** Skid Row Neighbo...

Also, Gen. Jeff on Facebook this afternoon: the aformation committeea now wants to change the boundaries and remove Main St. and the portion of Little Tokyo. As we understand it, that cannot be done without scrapping this effort and starting over with an entirely new subdivision application, lave attached his post.

Estela Lopez

<Jeffboundarypost4117.PNG>

6 of 6

11/05/2017 03:12 PM



Rita Moreno <rita.moreno@lacity.org>

LAPD Mandatory Registration Mtg for BID Security Officers

George Yu <geoyu28@aol.com>

Fri, Jun 2, 2017 at 4:24 PM

To: rita.moreno@lacity.org

I believe Allied Universal is the largest security service provider in the world. The officers are employees, not independent contractors, and are all individually licensed and certified and AUS has their own BTRC as a company.

I have requested AUS respond and will forward as a FYI.

-----Original Message-----

From: Rita Moreno <rita.moreno@lacity.org>

To: George Yu <geoyu28@aol.com>

Sent: Fri, Jun 2, 2017 3:48 pm

Subject: Re: LAPD Mandatory Registration Mtg for BID Security Officers

Hi George,

I'm new to this issue, but know that Allied Universal is responsible for obtaining the BTRC, which covers the company. However, if Allied considers the Security Officers as independent contractors and treats them as such, then each Security Officer is responsible for obtaining a BTRC.

Thanks for the info.

Rita

On Fri, Jun 2, 2017 at 11:19 AM, George Yu <geoyu28@aol.com> wrote:

Good morning Rita,

I know this is not under your purview but wanted to share with you that our BID officers had to attend a mandatory registration mtg at the police administration bldg this Thursday and Friday. Allied Universal is our private security contractor and all officers are licensed and registered. To have each individual officer apply for their own individual BTRC is a ridiculous policy and I never received notice of this from the City. How can we comply if we are not notified?

Please see link below on what lead up to this.

<http://michaelkohlhaas.org/wp/category/business-improvement-districts/hollywood-property-owners-alliance/hollywood-bid-patrol/>

Thank you,

GY

--

Rita Moreno
City of Los Angeles
Office of the City Clerk
Neighborhood and Business Improvement District Division
200 N. Spring Street, 2nd Floor #237
Los Angeles, CA 90012
Office (213) 978-1122
Fax (213) 978-1130